

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF R.H.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, R.H., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I live in Seattle, Washington with my spouse and three children.

5 3. I grew up in, and currently live in North Seattle, where I've lived most of my life.
6 I'm a CPA, and have worked in both the private sector and with not-for-profits over the course
7 of my career. I was raised in a close-knit Catholic community, and from a young age have been
8 motivated by the moral teachings of the church and the example of my community leaders, to
9 do what is right, even when it is hard.

10 4. Our oldest child identifies as non-binary. I have chosen to use a pseudonym and
11 to refer to them in this declaration as "Minor A" because I am fearful for them and our family's
12 safety and privacy in the current political climate. Minor A is currently 8 years old. They're shy,
13 silly, sensitive, and feel things deeply. They are radiant and creative, and love drawing animals
14 and painting nature scenes; writing stories and songs; dancing to pop music; jumping on the
15 trampoline; decorating our house to celebrate holidays with family; exploring the natural world,
16 and hunting for mushroom; starting clubs with friends and performing in plays they've written.

17 5. Minor A was assigned male at birth. As our first child, we sought to be loving
18 and accepting parents, committed to supporting them to become whoever they wanted to be. We
19 were often overwhelmed by the job of raising this new person. Minor A was beautiful and deeply
20 intelligent, and often reserved and difficult to soothe. In new settings or with unfamiliar
21 audiences, they would rarely speak, and took a long time to build trust.

22 6. At age four, Minor A told us they were a girl. While we had been conscious not
23 to perpetuate rigid gender norms – we didn't want restrictive norms of masculinity to hold our
24 child back from expressing their true self – we were not familiar with or conversant in gender
25 identity in child development, or prepared to support our toddler's 'social transition'. Changing
26 their pronouns and explaining the change to teachers, kids, grandparents, etc. felt daunting, and

1 also risky: how could we protect our kid from the awkwardness or even cruelty that such
2 conversations might prompt? Minor A had always loved pink, wore dresses, and gravitated
3 toward girl playmates and friends; they wanted to be a mom when they grew up. Our response
4 had been supportive, but also reinforcing of the gender binary: “boys can wear dresses”; “boys
5 can have long hair”; “boys can be friends with girls”. When they told us they were a girl, my
6 wife and I felt overwhelmed at first by the prospect of supporting our kids’ ‘social
7 transition’ – how would our reserved, quiet four-year-old know how to talk about this complex
8 topic, let alone self-advocate – when it felt like all the adults we knew, ourselves included, lacked
9 experience distinguishing between biological sex, gender identity and gender expression? And
10 how would we protect our child from being misunderstood or abused in a political environment
11 where one side of the culture war routinely conflates sexual orientation and gender identity, and
12 attacks supporters of gender diversity as sexual deviants, even criminals?

13 7. We learned as much as we could, as quickly as we could, about children’s gender
14 identity and development, and gender diversity in general. We joined a support group where we
15 could openly voice our uncertainty, acknowledge our ignorance, and wrestle with these questions
16 with other parents who were on the same journey. What we found was that it was mostly the
17 adults, and not the kids, that experienced anxiety and difficulty discussing the topic. As with so
18 much of parenting, our job was not to have all the answers, but rather to genuinely offer
19 compassion and support to our kid. We put aside our fears for long enough so that we could
20 actually stop and listen to what our kid was saying, and do the next right thing. The only question
21 we really needed to ask was what pronouns they wanted us to use. They were clear: they wanted
22 everyone to use she/her pronouns. So that’s what we did.

23 8. For us, and for their grandparents, it wasn’t easy at first, and we occasionally got
24 their pronouns wrong. But rather than ignoring the mistake or feeling shame at getting it wrong,
25 our kid was able to gently correct us, and to see that we were listening. That was the beginning
26 of a new level of trust between us and our kid, and a new relationship with gender diversity for

1 us. And the other children in our life had no trouble. One conversation was all they needed to
2 'get it,' and they moved on. We also learned that our kid had already been defending their gender
3 identity at pre-school for weeks, in the context of playground games where boys were chasing
4 girls, and had already secured the support of their peer group.

5 9. We moved Minor A to a pre-school that was more experienced with gender
6 diverse kids, and Minor A began to thrive. They started kindergarten as a girl, and soon told us
7 that they preferred using they/them pronouns.

8 10. It has been a powerful and enabling experience to help my child explore their
9 gender identity, not just for Minor A, but for myself, my wife, our extended family, and their
10 peers. It has involved a lot of learning. It has also helped our two youngest children understand
11 themselves and their gender better, and be more comfortable expressing themselves without
12 stigma because their older sibling is a positive demonstration of autonomy and agency.

13 11. As Minor A is currently eight years old, we have not made any firm decisions
14 around medical transition or gender-affirming medical care, because Minor A has not yet begun
15 puberty. We know that at each step on our journey as parents supporting our kids, our job is to
16 get as much information as we can, to share it in a developmentally appropriate way, and to
17 support them to make the decision that feels right. As Minor A ages, it continues to feel like
18 uncharted territory for our family; but we know, because we have a strong community of families
19 with gender diverse kids, that we will be able to support them through the decisions they make,
20 with transparency, compassion, and courage.

21 12. Our uncertainty about the future has been made more complex by the recent wave
22 of restrictions on gender-affirming care across dozens of US states and in the UK. We can see
23 how this marginalized and poorly understood group has become the target of a bad faith political
24 movement which shields its hidden agenda (policing binary gender norms, re-instating a culture
25 of 'traditional family values,' accumulating power) by claiming to protect children it has
26 demonstrated it does not know or understand.

1 13. In late January 2025, I became aware of an Executive Order limiting gender-
 2 affirming care for youth. Reading through this order made me and my wife very stressed. Minor
 3 A is my child. They are a beautiful and brilliant kid, and I feel very protective of them. I want
 4 them to be able to continue to make the decisions that are right for them, including having the
 5 option to receive medical care that will enable them to thrive. It's scary to think that, even while
 6 doctors agree that gender-affirming care is medically necessary, even life-saving, for some
 7 children, we may not be able to get that care in the United States. The uncertainty has been
 8 difficult to cope with. It has put a strain on me and my wife; has impacted my ability to stay
 9 focused at work; made us fearful of what our kid might hear on the playground or see on the
 10 newsstand; and continues to cause lost sleep for everyone in our family who are afraid that our
 11 child will not be safe and healthy in the future.

12 14. I am particularly fearful of the environment this order and others like it create for
 13 trans children and their parents. It feels like my child is being targeted because they are trans,
 14 and that they are being picked on because trans people are a small and vulnerable group whose
 15 well-being is not a political priority. The reductive rhetoric and hateful language that elected
 16 officials use to describe trans and non-binary people mischaracterizes, vilifies, and treats as
 17 scapegoats people whose existence has never been in doubt and whose plight is treated with
 18 scorn. The vitriol and abuse trans and non-binary people experience in everyday life makes them
 19 and their loved ones afraid to speak out because of the danger it may put them in. For me and
 20 my wife, we are also very scared of rhetoric suggesting that actions we take to support our child
 21 and help them live their honest life without stigma is somehow abusive, or mutilating. I choose
 22 to make this declaration using a pseudonym because the politicization of gender has created a
 23 toxic environment which needlessly endangers those who speak out. I also want to protect my
 24 child's privacy as inextricably linked to their life, liberty, and pursuit of happiness. Remaining
 25 anonymous feels necessary so that I am not forced to choose between advocating for my
 26 child – which could put them dangerously in the spotlight; or staying quiet – which may allow

1 the ignorance of the loudest voices to take away my child's rights, risking loss of access to life
 2 saving, evidence-based care.

3 15. I grew up in Seattle, and my children have only ever lived in Seattle. This is our
 4 family's home. After finding out about this executive order, our family has had to consider
 5 whether we want to leave the country in order for our child to be able to get any medical care
 6 that they need in the future.

7 16. This executive order and the continued political attacks on trans children are an
 8 intrusion into my and my family's life. In the guise of protecting parents' rights, they threaten
 9 our ability to support our child in making the decisions that are in their best interest. If the
 10 government is arguing that children are being harmed by gender affirming care, they should have
 11 the burden of proof. The executive order claims that "countless children soon regret that they
 12 have been mutilated"; though countless studies have shown that access to care is thorough and
 13 de-transition and regret rates for individuals who receive gender affirming care are shockingly
 14 low. The medical care providers, parents, and communities who have defended and fought to
 15 support the lives of trans and non-binary individuals are not operating under the influence of a
 16 subversive cultural agenda; they are courageous individuals who embody our country's greatest
 17 values. It feels like a fundamentally American freedom to, in consultation with health care
 18 providers and my child, make the decisions that are the best for them. These political attacks on
 19 trans people are a direct threat to that freedom.

20 I declare under penalty of perjury under the laws of the State of Washington and the
 21 United States of America that the foregoing is true and correct.

22 DATED this ____ day of February 2025.

23
 24 _____
 25 R.H.
 26 Parent of Minor A

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20 I declare under penalty of perjury under the laws of the State of Washington and the
21 United States of America that the foregoing is true and correct.

22 DATED this 4TH day of February 2025.

23 
24 R.H.
25 Parent of Minor A
26

SEATTLE, WA
2/4/25